

**STATE OF NEW HAMPSHIRE**  
**BEFORE THE NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION**  
**DIRECT TESTIMONY OF MARISA B. PARUTA AND SCOTT R. ANDERSON**  
**PETITION OF PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE**  
**d/b/a EVERSOURCE ENERGY**  
**RECONCILIATION OF DEFAULT ENERGY SERVICE FOR THE PERIOD**  
**AUGUST 1, 2022 TO JULY 31, 2023**

**June 15, 2023**

**Docket No. DE 23-043**

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1 **I. INTRODUCTION**

2 **Q. Please state your name, business address and position.**

3 A. My name is Marisa B. Paruta. My business address is 107 Selden Street, Berlin,  
4 Connecticut. I am employed by Eversource Energy Service Company as the Director of  
5 Revenue Requirements and in that position, I provide service to Public Service Company  
6 of New Hampshire d/b/a Eversource Energy (“PSNH”, “Eversource” or the “Company”).

7 **Q. Please provide your educational and professional background.**

8 A. I received a Bachelor of Science degree in accounting from the University of Connecticut  
9 School of Business. I started my career at Arthur Andersen in the client audit and assurance  
10 practice, continuing at Deloitte in the same practice. I joined Northeast Utilities,  
11 Eversource’s predecessor, and worked in the accounting organization through multiple  
12 positions leading to the Director of Corporate Accounting and Financial Reporting in 2015.  
13 I moved to the Regulatory and Revenue Requirements team in my current position in June  
14 2021. I have been with Eversource Energy for over 20 years.

1

2 **Q. What are your principal responsibilities in your current position?**

3 A. I am currently responsible for the coordination and implementation of revenue  
4 requirements calculations and regulatory filings for the New Hampshire and Connecticut  
5 electric and natural gas subsidiaries of Eversource Energy, as well as the filings associated  
6 with PSNH's default Energy Service ("ES"), Stranded Cost Recovery Charge ("SCRC"),  
7 Transmission Cost Adjustment Mechanism ("TCAM"), System Benefits Charge ("SBC"),  
8 Regulatory Reconciliation Adjustment ("RRA") mechanism, and Base Distribution Rates.

9 **Q. Have you previously testified before the New Hampshire Public Utilities Commission**  
10 **(the "Commission")?**

11 A. Yes, I provided testimony before the Commission in the RRA filings submitted in Docket  
12 Nos. DE 21-029, DE 22-010 and DE 23-021; the Step 3 Adjustment filing in Docket No.  
13 DE 22-030; TCAM Rate filing in Docket No. DE 22-034; Recovery of Storm Expense  
14 filings in Docket Nos. DE 22-031 and DE 23-051; Default Energy Service rate filings in  
15 Docket No. DE 22-021; and SCRC rate filings in Docket No. DE 22-039. I also testified  
16 before the Commission in Docket No. DE 20-092 pertaining to the 2022-2023 Energy  
17 Efficiency Plan and Docket No. DE 21-078 pertaining to the EV Make Ready/Demand  
18 Charge Alternatives.

1 **Q. Mr. Anderson, please state your name, business address and position.**

2 A. My name is Scott R. Anderson. I am employed by Eversource Energy Service Company  
3 as the Manager of Rates in New Hampshire. In this position, I provide support to PSNH.  
4 My business address is 780 North Commercial Street, Manchester, New Hampshire.

5 **Q. What are your principal responsibilities in this position?**

6 A. As the Manager of Rates, I am responsible for activities related to rate design, cost of  
7 service, and rates administration for the Company.

8 **Q. Please describe your educational and professional background.**

9 A. I received a Bachelor of Arts degree in Mathematics from Hartwick College in 1986. In  
10 September 1986, I began my utility career in Rates and Regulatory Affairs for Central  
11 Vermont Public Service Corporation (“CVPS”) and rose to the position of Manager of  
12 Rates. In 2012, CVPS merged with Green Mountain Power Corporation (“GMP”) and I  
13 continued as Manager of Rates. In December 2022, I retired from GMP and assumed my  
14 current position with Eversource.

15 **Q. Mr. Anderson, have you previously testified before the Commission?**

16 A. I recently submitted testimony and attachments in the Company’s RRA filing in Docket  
17 No. 23-021. I have also previously testified before the Vermont Public Utility  
18 Commission, formerly known as the Public Service Board. While at CVPS, I testified  
19 before this Commission several times on behalf of Connecticut Valley Electric Company,

1 a New Hampshire subsidiary utility of CVPS, prior to the sale of that utility to PSNH in  
2 2004.

3 **II. OVERVIEW**

4 **Q. What is the purpose of your testimony?**

5 A. The purpose of our testimony is: (1) to seek the necessary approvals to set a fixed ES rate  
6 for the Small Customer class and a monthly ES rate for the Large Customer class,  
7 applicable for the six-month period beginning August 1, 2023 and ending January 31, 2024  
8 for Eversource customers who take service under the ES rate; and (2) to explain the ES rate  
9 reconciliation (over)/under recovery for the twelve-month period of August 1, 2022 to July  
10 31, 2023 for wholesale power supply expense and applicable revenues for the (i) Small  
11 Customer class, (ii) Large Customer class, and (iii) Renewable Portfolio Standard (“RPS”)  
12 compliance obligations. Inclusion of the Reconciliation Adjustment Factors in the  
13 calculation of the ES rates is consistent with the direction in Section II.H of the settlement  
14 agreement approved in Docket No. DE 17-113.

15 **Q. Please explain the ES rates for which the Company is seeking approval.**

16 A. In this proceeding, consistent with the Settlement Agreement approved in Docket No. DE  
17 17-113, Eversource is requesting that the Commission review and approve a fixed six-  
18 month ES rate for the Small Customer class for the period of August 1, 2023 through  
19 January 31, 2024 based on the weighted average of the six monthly-contracted prices  
20 contained in the supply agreement(s) with the winning ES supplier(s) for the Small

1 Customer class. For the Small Customer class, the fixed ES rate for the period of August  
2 1, 2023 through January 31, 2024 is \$0.12582 per kWh, as calculated on page 1 of  
3 Attachment MBP/SRA-1.

4  
5 The Company is also requesting that the Commission review and approve a monthly-  
6 variable ES rate for the Large Customer class for the period of August 1, 2023 through  
7 January 31, 2024 based on the six monthly-contracted prices contained in the supply  
8 agreement(s) with the winning ES supplier(s) for the Large Customer class. For the Large  
9 Customer class, the monthly ES rates for the period of August 1, 2023 through January 31,  
10 2024, as calculated on page 2 of Attachment MBP/SRA-1, are as follows:

<b>Large Customer Energy Service Rates (\$ per kWh)</b>					
<b>DE 22-021 Filing Approved Rates Order No. 26,645 (June 23, 2022)</b>		<b>DE 22-021 Filing Approved Rates Order No. 26,762 (January 20, 2023)</b>		<b>DE 23-043 Filing Proposed Rates</b>	
August 2022	\$0.22423	February 2023	\$0.48321	August 2023	\$0.11837
September 2022	\$0.19322	March 2023	\$0.32083	September 2023	\$0.09734
October 2022	\$0.17523	April 2023	\$0.21612	October 2023	\$0.09486
November 2022	\$0.24575	May 2023	\$0.17003	November 2023	\$0.13604
December 2022	\$0.41884	June 2023	\$0.14779	December 2023	\$0.22688
January 2023	\$0.48550	July 2023	\$0.18098	January 2024	\$0.29225

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1 **Q. Please describe the detailed support for the calculation of the Small Customer and**  
2 **Large Customer ES rates.**

3  
4 A. Attachment MBP/SRA-1, Page 1, provides the calculation of the total monthly ES rate for  
5 the Small Customer class, including the cost of RPS compliance, prior period  
6 reconciliations for ES, RPS, cost of administrative and general (A&G) expense, and  
7 working capital requirement associated with the ES offering. The weighted average Small  
8 Customer fixed ES rate for the period of August 1, 2023 through January 31, 2024 is  
9 calculated on Line 13.

10  
11 Attachment MBP/SRA-1, Page 2, provides the calculation of the total monthly ES rates for  
12 the Large Customer class, including the cost of RPS compliance, prior period  
13 reconciliations for ES, RPS, cost of A&G expense, and working capital requirement  
14 associated with the ES offering. The monthly Large Customer ES rates for the six-month  
15 period are calculated on Line 11.

16  
17 Attachment MBP/SRA-1, page 3, provides the forecasted A&G expenses associated with  
18 the ES offering. The A&G adjustment factor is calculated on Line 8.

19  
20 Attachment MBP/SRA-1, page 4, provides the forecasted working capital associated with  
21 the ES offering for both Small Customer and Large Customer classes. The monthly ES  
22 rates for the six-month period are calculated on Lines 7, 14, and 19, whereby the sum of

1 Lines 7 and 19 are for the Small Customer class and Lines 14 and 19 are for the Large  
2 Customer class.

3

4 **Q. Please identify the Reconciliation Adjustment Factor attachments you provided as**  
5 **part of your testimony.**

6 A. The attachments included in my testimony that relate to the calculation of the proposed  
7 reconciliation adjustment factors are as follows:

8 • Attachment MBP/SRA-2, Page 1, Small Customer Reconciliation and Rate  
9 calculation

10 • Attachment MBP/SRA-2, Page 2, Large Customer Reconciliation and Rate  
11 calculation

12 • Attachment MBP/SRA-2, Page 3, A&G Expenses

13 • Attachment MBP/SRA-2, Page 4, RPS Reconciliation and Rate calculation

14 • Attachment MBP/SRA-3, Pages 1 to 15, ES Lead/Lag Study

15

16 **Q. Please describe the detailed support for the calculation of the Small Customer, Large**  
17 **Customer and RPS Obligation Reconciliation and Reconciliation Adjustment**  
18 **Factors.**

19  
20 A. Attachment MBP/SRA-2, Page 1 (Small Customer), Page 2 (Large Customer) and Page 4  
21 (RPS Obligations), provide the preliminary Reconciliation (over)/under recovery for the  
22 twelve-month period August 1, 2022 to July 31, 2023 and the calculation of the  
23 Reconciliation Adjustment Factors based on the following data:

- 1 • Ten months actual (August 1, 2022 to May 31, 2023); Two months estimate (June
- 2 1, 2023 to July 31, 2023)
- 3 • Prior period (over)/under recovery
- 4 • ES revenues
- 5 • A&G expense (per Attachment MBP/SRA-2, Page 3)
- 6 • Wholesale Supplier Purchased Power expense
- 7 • RPS Obligations Expense (estimate; per Attachment MBP/SRA-2, Page 4)
- 8 • Return on Purchased Power and RPS Working Capital Requirement
- 9 • Carrying Charges based on Prime Rate

10 **Q. Please describe the RPS Reconciliation Adjustment.**

11  
12 A. Attachment MBP/SRA-2, Page 4 presents the reconciliation of RPS compliance  
13 obligations under RSA 362-F and the related revenue and expense by month for the  
14 twelve-month reconciliation period August 1, 2022 to July 31, 2023 as described below:

- 15 • RPS revenues reflect the RPS portion of ES revenues related to the:
  - 16 ○ RPS Adjustment Factor (Adder) - filed and approved in the semi-annual
  - 17 ES filings
  - 18
  - 19 ○ RPS Reconciliation Adjustment Factor - filed and approved annually
  - 20 effective August 1<sup>st</sup> for the twelve-month period August 1<sup>st</sup> to July 31<sup>st</sup>
  - 21
- 22 • RPS expense reflects the cost of compliance with the mandated RPS obligations
- 23 to administer the ES program under RSA 362-F, and which is recovered under
- 24 RSA 374-F:3,V(c):



- 1                   ○ RPS Current Month Actual/Estimate is the product of:
- 2                             ▪ ES billed sales
- 3                             ▪ RPS REC Requirement percentage by class<sup>1</sup>
- 4                             ▪ RPS Adjustment Factor (Adder) filed and approved \$ per MWh
- 5                                     REC price by class<sup>2</sup>
- 6                   ○ RPS Prior Year True-Up reconciles the difference between
- 7                             ▪ Form E-2500 RPS Compliance Obligation amount for prior
- 8                                     calendar year (filing due by July 15<sup>th</sup>)
- 9                             ▪ RPS Expense per book annual estimate.
- 10               • RPS Return on Working Capital Requirement

11

12 **Q. Please describe the beginning RPS Reconciliation over/under recovery balance as of**  
13 **July 31, 2022 shown in Attachment MBP/SRA-2, Page 4, Line 13.**

14

15 A. The beginning RPS Reconciliation over-recovery amount of approximately \$12.6 million

16 was calculated and filed on December 8, 2022 in Docket No. DE 22-021, Attachment

17 MBP-3, Page 4, Line 15, reflecting the actual activity for the prior twelve month RPS

18 reconciliation period August 1, 2021 to July 31, 2022.

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<sup>1</sup> <https://www.energy.nh.gov/sites/g/files/ehbemt551/files/inline-documents/sonh/order-rps-2023-01.pdf>

<sup>2</sup> Semi-annual ES filing, Eversource Energy Supply witness Attachment LJJ-4 (DE 22-021 (December 8, 2022)); Attachment LJJ-4 in this filing.

1 **Q. What was the primary factor that resulted in the RPS Reconciliation over-recovered**  
2 **balance at July 31, 2022 as filed on December 8, 2022 in Docket No. DE 22-021,**  
3 **Attachment MBP-3, Page 4?**

4  
5 A. The primary factor for the approximate \$12.6 million RPS Obligation prior period over-  
6 recovery was attributable to regulatory action late in the compliance year, specifically the  
7 Department of Energy's ("DOE") order issued on March 31, 2022<sup>3</sup>, which reduced the  
8 2021 RPS Purchase Obligation percentage for Class III RECs from eight percent to one  
9 percent. This resulted in an approximate \$9.1 million in over-recovery requiring a  
10 downward True-Up adjustment for the 2021 RPS compliance obligation, calculated using  
11 the difference between (i) the estimated 2021 RPS Obligation amount booked for calendar  
12 year 2021 that was based on the statutory RPS percentages and (ii) the Company's actual  
13 2021 RPS Obligation compliance amount that included the reduced Class III REC  
14 percentage of one percent as reflected in the Company's Form E-2500 filing on June 30,  
15 2022. At that time, the Company made an adjusting entry of approximately \$9.1 million  
16 for the 2021 RPS True-Up downward adjustment in June 2022 to account for the DOE's  
17 amendment to the Purchase Obligation for Class III RECs, as shown in Docket No. DE  
18 22-021, Attachment MBP-3, Page 4, Line 4 (December 8, 2022).

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21  

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<sup>3</sup> <https://www.energy.nh.gov/sites/g/files/ehbemt551/files/inline-documents/sonh/class-3-order-adjusting-2021-class-3-obligation.pdf>

1 **Q. Has there been a DOE ordered change to the 2022 RPS Purchase Obligation**  
2 **requirement that affect the RPS Reconciliation for the period of August 1, 2022 to**  
3 **July 31, 2023? If so, how has that adjustment been included in the Company's RPS**  
4 **Reconciliation?**

5  
6 A. Yes. The DOE issued an order<sup>4</sup> on April 11, 2023 that reduced the 2022 RPS Obligation  
7 percentage for Class III RECs from the statutory eight percent to one half a percent. Like  
8 the 2021 RPS Obligation, the Company calculated and booked the monthly 2022 RPS  
9 Obligation estimates based on the statutorily-required eight percent purchase requirement  
10 for Class III RECs. The Company was anticipating a significant downward amendment  
11 to the purchase obligation based on last year's action by the DOE and was therefore able,  
12 upon issuance of the order reducing the Purchase Obligation from eight percent to half of  
13 one percent, to include an approximate \$10.1 million downward adjustment updating the  
14 Company's total 2022 RPS Obligation estimate in April 2023 as reflected in Attachment  
15 MBP/SRA-2, Page 4, Line 3, to account for the DOE's mandated reduction in the Class  
16 III REC RPS Purchase Obligation percentage. Although the historical practice has been  
17 to account for the transaction in June annually to conform to the timing of the Company's  
18 Form E-2500 filing, inclusion of the approximately \$10.1 million adjustment to the Class  
19 III RPS Purchase Obligation to the RPS Obligation estimate in April will minimize any  
20 necessary reconciliation from the current compliance period due to adjustment of the Class  
21 III RPS Obligation Purchase requirement. This will help to avoid the degree of over-

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<sup>4</sup> RPS 2023-01 (March 31, 2023)

1 recovery that occurred in the prior compliance period and flow back the benefit to  
2 customers on an accelerated basis.

3

4 **Q. What are the preliminary results for Energy Service and Renewable Portfolio**  
5 **Standard (RPS) for the reporting period August 1, 2022 through July 31, 2023?**

6

7 A. Attachment MBP/SRA-2, Pages 1 through 4 include actual costs for the period from  
8 August 1, 2022 through May 31, 2023 and estimated costs for the period from June 1,  
9 2023 through July 31, 2023.

10

11 The base Small Customer Energy Service Rate over-recovery of \$27.6 million shown on  
12 Attachment MBP/SRA-2, Page 1, Line 13 is due to the July 31, 2022 beginning balance  
13 of \$11.5 million over-recovery, plus the current period carrying charge of a credit of \$1.7  
14 million and the current period \$14.4 million over-recovery related to ES revenues being  
15 higher than previously forecasted. This results in a preliminary ES Reconciliation  
16 Adjustment Factor rate of \$(0.00849) per kWh as shown on Attachment MBP/SRA-2,  
17 Page 1, Line 15.

18 The Large Customer Base Rate under-recovery of \$4.374 million shown on Attachment  
19 MBP/SRA-2, Page 2, Line 13 is due primarily to the current period's \$5.3 million under-  
20 recovery resulting from ES revenues being lower than purchased power expenses due to  
21 wholesale load requirements, plus the current period carrying charge of \$0.2 million,  
22 partially offset by the July 31, 2022 beginning balance of \$1.1 million over-recovery. This

1 results in a preliminary ES Reconciliation Adjustment Factor rate of \$0.02099 per kWh as  
2 shown on Attachment MBP/SRA-2, Page 2, Line 15.

3 The RPS expense over-recovery of \$21.0 million shown on Attachment MBP/SRA-2, Page  
4 4, Line 13 is due primarily to the July 31, 2022 beginning balance of \$12.6 million over-  
5 recovery (which includes the approximate \$9.1 million described above) and the current  
6 period over-recovery due to RPS expenses being higher than revenues (which includes the  
7 approximate \$10.1 million described above). In addition, the return on RPS working  
8 capital costs totaled a credit of \$0.8 million based on a lead/lag analysis, and the current  
9 period carrying charges totaled a credit of \$1 million. This results in a RPS Reconciliation  
10 Adjustment Factor rate of a \$(0.00607) per kWh credit as shown on Attachment  
11 MBP/SRA-2, Page 4, Line 15.

12

### 13 **III. LEAD/LAG STUDY**

14 **Q. Did the Company include a working capital component for Energy Supply and**  
15 **Renewable Energy Credits (RECs) in the calculation of the ES rates filed on June 16,**  
16 **2022?**

17

18 A. Yes. In Order No. 26,237 issued on April 25, 2019 in Docket No. DE 18-073, the  
19 Commission authorized Eversource to use the results of a lead/lag study in the calculation  
20 of working capital requirements for ES rates. The Company has conducted an update to its  
21 previous lead/lag study based on calendar year 2022 as provided in Attachment MBP/SRA-

1           3 and incorporates the results of the study to calculate the return on cash working capital  
2           requirements included in this filing for rates effective August 1, 2023.

3   **Q. What is cash working capital?**

4   A. Cash working capital is the amount of money that is needed by Eversource to fund operations  
5       in the time period between when expenditures are incurred to provide service to customers  
6       and when payment is actually received from customers for that service.

7   **Q. How is cash working capital estimated through a lead/lag study?**

8   A. A lead/lag study identifies the amount of time it typically takes for the Company to collect  
9       revenue from customers, as well as the amount of time the Company takes to make payment  
10      for applicable operating costs. The difference between those two numbers is used as the  
11      basis to estimate cash working capital requirements.

12   **Q. Please define the terms “revenue lag days” and “expense lead days.”**

13   A. Revenue lag is the time, measured in days, between delivery of a service to Eversource  
14      customers and the receipt by Eversource of the payment for such service. Similarly, expense  
15      lead is the time, again measured in days, between the performance of a service on behalf of  
16      Eversource by a vendor or employee and payment for such service by Eversource. Since  
17      rates are based on revenue and expenses booked on an accrual basis, the revenue lag results

1 in a need for capital while the expense lead offsets this need to the extent the Company is  
2 typically not required to make payment to its vendors until after a service is provided.

3 **Q. Please describe the Lead/Lag Study (Attachment MBP/SRA-3) and its findings.**

4 A. The Lead/Lag Study based on calendar year 2022 costs and revenues consists of 15 pages of  
5 calculations and supporting schedules to separately calculate lag days for Purchased Power  
6 and RPS expense as shown in the table below:

Description	Attachment MBP/SRA-3 Reference	Customers		RPS
		Small	Large	Compliance
Net Lag/(Lead) Days	Page 3, Col. (C)	(8.26)	18.14	(143.62)
Percentage of Annual Expense	Page 3, Col. (D)	-2.26%	4.97%	-39.35%
Percentage of Forecast Monthly Expense	Page 1, Lines 9 and 10	-26.7 to -28.5	58.5 to 62.5	N/A

8

9 **Q. How is the retail revenue lag computed?**

10 A. The retail revenue lag consists of a “meter reading or service lag,” “collection lag” and a  
11 “billing lag.” The sum of the days associated with these three lag components is the total  
12 retail revenue lag experienced by Eversource as shown on Attachment MBP/SRA-3, Page 5.

13 **Q. What lag does the Lead/Lag Study reveal for the component "meter reading or service  
14 lag?"**

15 A. The Lead/Lag Study reveals 15.2 days. This lag was obtained by dividing the number of  
16 billing days in the test year (365 days) by 12 months and then in half to arrive at the midpoint  
17 of the monthly service periods.

18

1 **Q. How was the “collection lag” calculated and what was the result?**

2 A. The combined “collection lag” for Energy Service totaled 21.59 days. This lag reflects the  
3 time delay between the mailing of customer bills and the cash receipt of the billed revenues  
4 from customers. The 21.59 days lag was arrived at by a thorough examination of Energy  
5 Service accounts receivable balances using the accounts receivable turnover method. End  
6 of month balances were utilized as the measure of customer accounts receivable. Attachment  
7 MBP/SRA-3, Page 6 details monthly balances for retail accounts receivables, separated by  
8 Small and Large Customers. Attachment MBP/SRA-3, Page 6 calculated the Collection Lag  
9 by taking the total revenues and dividing it by the daily average receivable balance, deriving  
10 a Receivable Turnover rate (Line 21), which is then used to calculate the Collection Lag (365  
11 days/Receivables Turnover rate) to arrive at 19.89 days for Small Customers and 46.59 days  
12 for Large Customers.

13 **Q. How did you calculate the “billing lag”?**

14 A. Nearly all of the Company’s customers are billed the evening after the meters are read.  
15 However, if a meter is read on a Friday or prior to a scheduled holiday, there is additional  
16 lag over the weekend or holiday. The Company’s billing lag calculation accounts for any  
17 additional lag over weekends and holidays. The lead/lag study weights the average monthly  
18 billing days by the accounts receivable balances resulting in a weighted billing lag of:

- 19 • 1.53 days for Small Customers (Attachment MBP/SRA-3, Page 7, Line 13)
- 20 • 1.54 days for Large Customers (Attachment MBP/SRA-3, Page 8, Line 13).



1 **Q. Is the total retail revenue lag computed from these separate lag calculations?**

2 A. Yes. The total retail revenue lag of 36.63 days for Small Customers and 63.33 days for Large  
3 Customers is computed by adding the number of days associated with each of the three retail  
4 revenue lag components as shown on Attachment MBP/SRA-3, Page 5. This total number  
5 of lag days represents the amount of time between the recorded delivery of service to retail  
6 customers and the cash receipt from retail customers of the related billed revenues.

7 **Q. What expense is Purchased Power Cash Working Capital intended to address?**

8 A. Purchased Power Cash Working Capital provides cash working capital for expenses paid by  
9 Eversource to procure from wholesale energy suppliers wholesale energy output per the  
10 terms of the Commission approved wholesale supplier contracts on behalf of Small and  
11 Large ES customers.

12 **Q. In determining the expense lead period, how were the weighted lead days in payment  
13 of Purchased Power costs determined?**

14  
15 A. As shown on Attachment MBP/SRA-3, Pages 9 and 10, Purchased Power payments were  
16 reviewed and the lead days were calculated for Small Customer and Large Customer  
17 categories. Each payment was dollar weighted to arrive at Purchased Power expense lead  
18 days.

1 **Q. How were the weighted lead days in payment of Renewable Portfolio Standard (“RPS”)**  
2 **costs determined?**

3  
4 A. RPS compliance is achieved through a combination of market purchases, contracted  
5 purchases through Long-Term Purchase Power Agreements with Burgess BioPower and  
6 Lempster Wind and ACPs. The Company obtains and retires RECs from these sources, or  
7 provides ACP, to meet annual RPS requirements. However, RPS compliance filings are due  
8 between July 1 and July 15 following the end of the prior compliance year. As a result, REC  
9 procurement activity and payment continues for up to six months following the end of the  
10 annual period in which RPS compliance obligations are incurred. This timing of RPS  
11 compliance activity is reflected in the Company’s lead/lag study.

12  
13 For market purchases, payments to IPPs were reviewed and weighted. The lead days was  
14 determined by comparing the date of payment for RECs to the load-weighted midpoint of  
15 the compliance year to which they were applied for RPS compliance. The schedule of  
16 payments for market purchases of 2022 RECs and estimated ACP is included in Attachment  
17 MBP/SRA-3, page 13. The payment dates for these purchases are compared to the load-  
18 weighted midpoint of the 2022 compliance year to which they were applied for RPS  
19 compliance. The resulting dollar-weighted lead for market REC purchases and ACP was  
20 335.6 days.

21 For contract purchases, payments for RECs procured through long-term contracts are made  
22 on a more timely, regular basis as shown in Attachment MBP/SRA-3, Page 14. However,

1        only a portion of RECs from these contracts is applied to RPS compliance. The remainder  
2        is resold. Additionally, the cost of RECs from these contracts reflected in the ES rate is  
3        based upon a market transfer price credited to the Company’s SCRC. To properly determine  
4        the cash working capital impact of these contract purchases associated with ES, the lead for  
5        contract purchases was dollar-weighted by amounts that reflected the percentage of RECs  
6        retired for ES/RPS compliance and a cash-basis equal to the lesser of 1) the contract price or  
7        2) the transfer price. The resulting lead for contract purchases was 128.76 days.

8        The average of market and contract purchases is shown on Attachment MBP/SRA-3, Page  
9        11 for a total RPS expense lead of 182.0 days.

10    **Q.    Would you summarize the Company’s proposal regarding Cash Working Capital?**

11    A.    Yes, the results of the lead/lag analysis of ES Cash Working Capital are noted in the table  
12        below:

Description	Attachment MBP/SRA-3 Reference	Customers		RPS
		Small	Large	Compliance
Net Lag/(Lead) Days	Page 3, Col. (C)	(8.26)	18.14	(143.62)
Percentage of Annual Expense	Page 3, Col. (D)	-2.26%	4.97%	-39.35%
Percentage of Forecast Monthly Expense	Page 1, Lines 9 and 10	-26.7 to -28.5	58.5 to 62.5	N/A
Cash Working Capital Balance (Aug 2023 to Jul 2024)	Page 1, Lines 12, 13 and 14	(\$9,720) avg	\$1,486 avg	(\$7,364) avg
Cash Working Capital Return (Aug 2023 to Jul 2024)	Page 1, Lines 17, 18 and 19	(\$401)	\$61	(\$608)
Cash Working Capital Return (Aug 2022 to Jul 2023)	Page 2, Lines 17, 18 and 19	\$110	\$261	(\$773)

13

1 **Q. Mr. Anderson has the Company calculated the customer bill impacts for the proposed**  
2 **August 1, 2023 ES rate change?**

3  
4 A. Yes. The rate impacts are provided in Attachment MBP/SRA-4.

5 • Page 1 provides a comparison of residential rates proposed for effect August 1,  
6 2023 to current rates effective February 1, 2023 for a 550 kWh monthly bill, a 600  
7 kWh monthly bill, and a 650 kWh monthly bill.

8 • Page 2 provides a comparison of residential rates proposed for effect August 1,  
9 2023 to rates effective August 1, 2022 for a 550 kWh monthly bill, a 600 kWh  
10 monthly bill, and a 650 kWh monthly bill.

11 • Page 3 provides the average impact of each change on bills for all rate classes by  
12 rate component and on a total bill basis, including ES.

13

14 **IV. CONCLUSION**

15 **Q. Has the Company provided updated Tariff pages as part of this filing?**

16 A. Yes, updated tariff pages have been provided as Attachment MBP/SRA-5.

17

18 **Q. Is Eversource requesting Commission approval of this rate by a specific date?**

19 A. Yes, Eversource is respectfully seeking final approval of the proposed ES rates by June 22,  
20 2023 to inform the winning bidders, allow for appropriate notice customers and implement  
21 the new rates for service rendered on and after August 1, 2023.

22

1 **Q: Would Commission approval of this rate result in just and reasonable rates?**

2 A: Yes it would.

3

4 **Q. Does this conclude your testimony?**

5 A. Yes, it does.